

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF MICHIGAN
SOUTHERN DIVISION

UNITED STATES OF AMERICA,

Plaintiff,

CRIMINAL NO. 10-cr-20162

vs.

D-2 AARON LAMAR MOORE,
a/k/a "Frost"

HON. ROBERT H. CLELAND

Defendant.

_____ /

STIPULATED PROTECTIVE ORDER

Pursuant to Federal Rule of Criminal Procedure 16(d), the parties to the above criminal action do hereby stipulate and agree to the following protective order:

1. Prior to sentencing, the government shall produce to defense counsel videotape and/or audio evidence of Defendant's criminal activity.
2. The videotape and/or audio evidence shall be used by defense counsel only for purposes of preparation for sentencing.
3. Defense counsel shall not disclose any of the videotape and/or audio evidence provided by the government. Defense counsel shall share this material only with her client, paralegals, and/or investigators working with her, and only for purposes of preparation for sentencing. Defense counsel shall insure that materials disclosed to any of the previously described persons will not be further disclosed.

4. Defendant shall not duplicate the videotape and/or audio evidence, and shall not provide a copy of such evidence to her client.
5. Defense counsel shall be present at all times that Defendant reviews the videotape and/or audio evidence. Defendant shall not be permitted to view or possess the videotape and/or audio evidence outside of counsel's presence.
6. Absent further stipulation by the parties or order of the Court, Defendant shall not be permitted to view the videotape and/or audio evidence on more than one occasion. In other words, Defendant shall be permitted to review the videotape and/or audio evidence during a single meeting with defense counsel, and absent further stipulation or order, he may not review the videotape evidence during any subsequent meeting with counsel.
7. Defense counsel shall return the videotape and/or audio evidence to the government upon review by Defendant.

So Stipulated:

/s/ Andrew Goetz
ANDREW GOETZ
Assistant United States Attorney

/s/ Carole Stanyar (w/permission)
CAROLE STANYAR
Attorney for Defendant

Dated: October 23, 2012

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ORDER BASED ON STIPULATION

This Court, having reviewed the parties' stipulation, being advised in the matter, and for the reasons stated by the parties,

IT IS HEREBY ORDERED that the disclosure of the videotape and/or audio evidence is controlled by the provisions of the stipulation.

S/Robert H. Cleland
ROBERT H. CLELAND
UNITED STATES DISTRICT JUDGE

Dated: October 29, 2012

I hereby certify that a copy of the foregoing document was mailed to counsel of record and/or pro se parties on this date, October 29, 2012, by electronic and/or ordinary mail.

S/Lisa Wagner
Case Manager and Deputy Clerk
(313) 234-5522